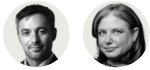


## **EXHIBIT 20**

# Activists Flood Election Offices With Challenges

Groups fueled by right-wing election conspiracy theories are trying to toss tens of thousands of voters from the rolls. “They are just going to beat the system into the ground,” said one election official.



By Nick Corasaniti and Alexandra Berzon

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Activists driven by false theories about election fraud are working to toss out tens of thousands of voter registrations and ballots in battleground states, part of a loosely coordinated campaign that is sowing distrust and threatening further turmoil as election officials prepare for the November midterms.

Groups in Georgia have challenged at least 65,000 voter registrations across eight counties, claiming to have evidence that voters’ addresses were incorrect. In Michigan, an activist group tried to challenge 22,000 ballots from voters who had requested absentee ballots for the state’s August primary. And in Texas, residents sent in 116 affidavits challenging the eligibility of more than 6,000 voters in Harris County, which is home to Houston and is the state’s largest county.

The recent wave of challenges have been filed by right-wing activists who believe conspiracy theories about fraud in the 2020 presidential election. They claim to be using state laws that allow people to question whether a voter is eligible. But so far, the vast majority of the complaints have been rejected, in many cases because election officials found the challenges were filed incorrectly, rife with bad information or based on flawed data analysis.

Republican-aligned groups have long pushed to aggressively cull the voter rolls, claiming that inaccurate registrations can lead to voter fraud — although examples of such fraud are exceptionally rare. Voting rights groups say the greater concern is inadvertently purging an eligible voter from the rolls.

The new tactic of flooding offices with challenges escalates that debate — and weaponizes the process. Sorting through the piles of petitions is costly and time-consuming, increasing the chances that overburdened election officials could make mistakes that could disenfranchise voters. And while election officials say they’re confident in their procedures, they worry about the toll on trust in elections. The challenge process, as used by election deniers, has become another platform for spreading doubt about the security of elections.

“It’s a tactic to distract and undermine the electoral process,” said Dele Lowman Smith, chairwoman of the DeKalb County Board of Elections in Georgia. Her county is among several in Georgia that have had to hold special meetings just to address the challenges. The state’s new Republican-backed election law requires that each challenge receive a hearing, and the process was taking up too much time in regular board meetings.

The activists say they are exercising their right to ensure that voter rolls are accurate.

“If a citizen is giving you information, wouldn’t you want to check it and make sure it’s right?” said Sandy Kiesel, the executive director of Election Integrity Fund and Force, a group involved in challenges in Michigan.

But in private strategy and training calls, participants from some groups have talked openly about more political aims, saying they believe their work will help Republican candidates. Some groups largely target voters in Democratic, urban areas.

It is not unusual for voter rolls to contain errors — often because voters have died or moved without updating their registrations. But states typically rely on systematic processes outlined in state and federal law — not on lists provided by outside groups — to clean up the information.

Still, groups have submitted challenges before. True the Vote, a Texas group behind the misinformation-laden film “2,000 Mules,” challenged more than 360,000 voters in Georgia before Senate runoff elections in 2021.

The new tactics and types of challenges have spread wildly since, as a broad movement has mobilized around former President Donald J. Trump’s lies that the election was stolen. An influential think tank with close Trump ties, the Conservative Partnership Institute, has distributed a playbook that instructs local groups on how to vet voter rolls. Another national group, the America Project, backed by Michael Flynn and Patrick Byrne, influential members in the election denial movement, have helped fund a Georgia outfit that has challenged ballots across the state. America Project’s support was first reported by Bloomberg News.

In mid-September, another Georgia group, Greater Georgia, co-sponsored a Zoom training session about how to file challenges with roughly a dozen activists. The group, which was founded by former Senator Kelly Loeffler, said the goal was protecting “election integrity.”

The areas it focused on — counties in the metro Atlanta area — have the highest concentration of Democratic voters in the state. The leader of the training, Catherine McDonald, who works for the Voter Integrity Project, told participants she believed Jon Ossoff and Raphael Warnock, both Democrats, won their Senate races in 2021 in part because judges refused to hear cases challenging what she considered illegal voting.

“There were more than enough illegal votes,” Ms. McDonald said at the outset of the training, according to a transcript of the event obtained by The New York Times. “None of the judges in Fulton or DeKalb would take the case.”

Greater Georgia declined to comment on the training.



Thousands of voters have been challenged in Georgia’s Gwinnett County. Nicole Craine for The New York Times

Of the challenges brought in Gwinnett County in Georgia, 15,000 to 20,000 were rejected, while a further 16,000 or so remained undecided. In many cases, the methodology was found to be flawed or misguided. In Forsyth County, Ga., 6 percent of the 17,000 voters challenged were removed from the rolls, according to county records, after election officials determined that the submissions either did not meet necessary requirements or were factually incorrect.

In Michigan, the secretary of state’s office said an attempt to challenge 22,027 ballots at once was invalid — state law says challenges must be submitted one at a time rather than in bulk, Jonathan Brater, director of the state’s Bureau of Elections, wrote in a letter to local officials.

Mr. Brater highlighted other issues with the group's work. The activists used the U.S. Postal Service's change of address system as evidence indicating a voter's registration isn't valid. But many people in that system, including students and members of the military, are still eligible to vote at their previous address, he wrote. Other challenges were based on a glitch that listed Jan. 1, 1900, as a place-holder registration date for people registered before new software was introduced.

In interviews with The Times, leaders with the group behind the effort, Election Integrity Fund and Force, said they did not have clear evidence that the voters listed were ineligible. They were simply prompting elections officials to make a closer examination of some potential errors, they said.

They weren't aware of any voters removed from the rolls as a result, they said.

Election Integrity Fund and Force has been working in Michigan since the 2020 election, promoting skepticism about the election's legitimacy. This month, it sued the governor and secretary of state in an attempt to decertify President Biden's win in the state. It has also sent volunteers knocking on doors to survey residents about the registered voters in their homes. They presented their results to election officials as evidence of problems with the voter rolls.

But officials who reviewed the group's findings said they were riddled with errors and leaps in logic. "They don't have a grasp of how things actually work," said Lisa Brown, the county clerk for Oakland County in the Detroit suburbs.

Ms. Brown said a colleague found a friend on the group's list of problematic registrations because the friend forwards her mail. "She's a snowbird. So, yeah, she forwards her mail to Florida when she's down there, but she still lives here," Ms. Brown said.

Ms. Kiesel, the group's executive director, said her group planned to send lists of names to Michigan election officials before the November election. The lists will also go to poll workers, she said.

If voters are challenged at polling places, their ballots would be immediately counted. But the ballots would also be marked and could be reviewed later if a candidate or group sued, officials said.

Ms. Kiesel has shared her group's plans with various coalitions of election activists in Michigan, including one with ties to the Conservative Partnership Institute, according to audio of conference calls obtained by The Times. A lawyer who aided Mr. Trump in his effort to overturn the 2020 results, Cleta Mitchell, is leading the institute's effort to organize activists.

"We learned a lot by the challenges," Ms. Kiesel said on one call with the coalition in August. "We need people to help us to do the same thing in the November election."



Election workers checking voter registrations in Lansing, Mich., on Election Day in 2020. John Moore/Getty Images

Chris Thomas, a former elections director for Michigan now working as a consultant for Detroit, said he did not expect the challenges to succeed. But one concern is that activists will use rejections to sow doubt about the legitimacy of elections if they don't like the results.

"They can't get over the fact they lost," Mr. Thomas said. "They are just going to beat the system into the ground."

Another canvassing operation fanned out across Harris County, Texas, over the summer. Volunteers with the Texas Election Network, a group with ties to the state Republican Party, went door to door, clipboards in hand, to ask residents if they were the voters registered at those addresses. The canvassing effort was first reported by The Houston Chronicle.

Soon after, 116 affidavits challenging the registration of thousands of voters were filed with the Harris County Election Office, according to data obtained through an open records request by The New York Times. Each affidavit, sent by individual citizens, was written exactly the same.

"I have personal knowledge that the voters named in this affidavit do not reside at the addresses listed on their voter registration records," the affidavits said. "I have personally visited the listed addresses. I have personally interviewed persons actually residing at these addresses."

Each affidavit failed to meet the state's standards, and after a quick investigation, all were rejected by the election administrator of Harris County.

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